

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FILED

JAN -4 2017

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

)

Plaintiff,

)

v.

)

GWENDOLYN HAMPTON,

)

Defendant.

)

4:17CR003 CEJ/PLC

INDICTMENT

COUNTS I through V (Tax Evasion)

The Grand Jury charges that:

*Introduction*

1. Between 2007 and 2014 Defendant Gwendolyn Hampton resided in the Eastern District of Missouri and was engaged in the management and operation of daycare centers in the Eastern District of Missouri.
2. One of the daycare centers Defendant owned and operated was Hampton Academy, LLC which provided childcare to low income families.
3. Hampton Academy was primarily paid for its services by the Missouri Department of Social Services and the Missouri Department of Health and Senior Services.
4. Between January 1, 2009 and December 31, 2013 (the “relevant time period”), Hampton Academy collected \$2,387,386.27 in revenue. Virtually all of these funds were deposited into a single business bank account.
5. During the relevant time period, Defendant pulled prodigious amounts of cash and cashier’s checks from the aforementioned account totaling \$1,338,549.00.
6. For the years 2009 and 2011, Defendant did not file a federal tax return.
7. For the years 2010, 2012 and 2013, Defendant filed false returns understating her income and tax owed.

8. From 2009 and 2013, by means of false returns, cash transactions and other affirmative acts, Defendant sought to evade \$376,463.00 in tax.

*Offense Conduct*

9. Between on or about January 1, 2010 and continuing through on or about April 15, 2014, in the Eastern District of Missouri and elsewhere, the Defendant,

**GWENDOLYN HAMPTON,**

did willfully attempt to evade and defeat a large part of the income tax due and owing by her to the United States of America for the calendar years 2009 through 2013 as set forth below with each year constituting a separate count by signing and causing to be signed a false and fraudulent U.S. Individual Income Tax Return, Form 1040, on behalf of herself and by other affirmative acts of evasion.

Count	Year	Tax Paid	True tax Due and Owing
I	2009	\$0	\$81,967
II	2010	\$5,773 refund	\$99,767 (including refund)
III	2011	\$0	\$104,708
IV	2012	\$5,064 refund	\$67,596 (including refund)
V	2013	\$5,547 refund	\$22,425 (including refund)

All in violation of Title 26, United States Code Section 7201.

A TRUE BILL

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FOREPERSON

Respectfully submitted,

RICHARD G. CALLAHAN  
United States Attorney

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Thomas C. Albus, #46224MO  
Assistant United States Attorney